

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC. PELVIC REPAIR
SYSTEMS PRODUCTS LIABILITY
LITIGATION

Master File No. 2:12-MD-02327
MDL 2327

ETHICON NON-REVISION PTO 298
(ELECTION WAVE) CASES LISTED IN
EXHIBIT A OF DEFENSE NOTICE OF
ADOPTION

JOSEPH R. GOODWIN U.S. DISTRICT
JUDGE

**NOTICE OF ADOPTION OF PRIOR DAUBERT RESPONSE OF
VLADIMIR IAKOVLEV, M.D. FOR NON-REVISION PTO 298 (ELECTION WAVE)**

Comes now, the Plaintiffs, and hereby adopt and incorporate by reference the Daubert response filed in relation to Vladimir Iakovlev, M.D. for Ethicon Wave 4, Dkt. 3790. Plaintiffs respectfully request that the Court deny Defendants' motion, for the reasons expressed in the Wave 4 response briefing.

This notice applies to the Ethicon Election Wave (PTO 298) and C.R. Bard case, Lori Manning v. C.R. Bard, Inc., et al., Case No. 2:17-cv-00775.

Dated: December 27, 2018

Respectfully submitted,

/s/ D. Renee Baggett

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CERTIFICATE OF SERVICE

I hereby certify that on December 27, 2018, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

/s/ D. Renee Baggett
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